

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIERNEY O'NEAL and JUSTINE WILBER,

Plaintiffs,

- against -

WILDLIFE CONSERVATION SOCIETY, ATU
MARSHALL, DENISE MCCLEAN, ZULMA
RIVERA and CRAIG PIPER

Defendants.

1:17-Cv-6882 (JGK)

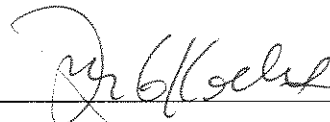
PROPOSED SCHEDULING ORDER

The parties propose that the Court's Scheduling Order filed July, 2018 be modified as follows:

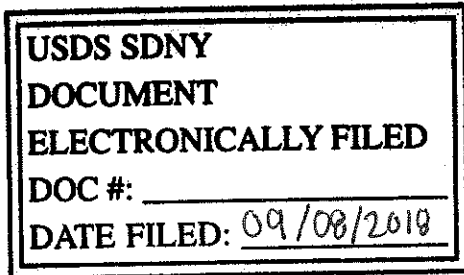
1. All expert discovery including Parties' expert reports and depositions, witness lists and identification of documents pursuant to Fed. R. Civ. P. 26(a)(2), (3) and 35(b), is to be completed by **October 29, 2018**.
2. Dispositive motions, if any, are to be made by **November 19, 2018**.
3. If no dispositive motion is made, a joint pretrial order, together with any motions in limine, requests to charge, and proposed voir dire, shall be submitted by **December 10, 2018**. The parties shall be ready for trial on 48 hours' notice on or after **January 3, 2019**.

SO ORDERED:

Dated: September 7, 2018



Hon. John G. Koeltl, District Judge





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September 7, 2018

VIA ECF

Hon. John G. Koeltl
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 12B
New York, NY 10007-1312

Re: O'Neal and Wilber v. Wildlife Conservation Society, et al.
Case No. 1:17-cv-06882-JGK

Dear Judge Koeltl:

This firm represents Defendants Wildlife Conservation Society, Zulma Rivera, Denise McClean and Craig Piper ("the WCS Defendants"). Pursuant to Rule 1E of Your Honor's Individual Rules of Practices, we write with the consent of Plaintiffs and co-defendant Marshall to seek a 45 day extension of the expert discovery deadline. We respectfully request that the expert discovery deadline, presently scheduled for September 14, 2018, be extended to October 29, 2018. The WCS Defendants are requesting this extension because they have not received records from Plaintiffs' mental health providers and will have to evaluate those records, determine whether the providers must be deposed and whether the WCS Defendants must retain a psychiatric expert to examine plaintiffs.

This is the parties' second request for an extension of time to complete discovery. The first request was granted. A proposed revised civil case management plan and scheduling order is enclosed.

Respectfully submitted,

/s/ Stephen A. Fuchs

Stephen A. Fuchs
SAF/iag

cc: Connor McNamera (via ECF)
Robert L. Byrne, Esq. (via ECF)